



Data Protection Policy

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Data Protection Policy

SECTION 1 - DATA PROTECTION POLICY

1. Policy Statement

This Policy sets how British Dodgeball will comply with its data protection obligations and seek to protect the rights of its staff, members, participants and business contacts in respect of their personal data under the UK General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA).

2. Objectives

- To set out the procedures that are to be followed when dealing with personal data;
- To outline the procedures to be followed if there is a data breach; and
- To be concise, clear and transparent about how it obtains and uses personal information of all individuals with whom it deals, and how (and when) we delete that information once it is no longer required.

3. Scope

This Policy applies to:

- Any British Dodgeball stakeholder, including its board members, directors, officers, and those of its employees (including sub-contractors) or volunteers who are involved in any aspect of data handling in any capacity.

4. Definitions

- **Personal Data:** Any information relating to an individual who can be identified (directly or indirectly) from that information;
- **Data Subject:** The individual to whom the personal data relates;
- **Sensitive Personal Information:** Personal information about an individual's race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership (or non-membership), genetics information, biometric information (where used to identify an individual) and information concerning an individual's health, sex life or sexual orientation;
- **Data Breach:** A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal information.

5. Data Protection Principles

GDPR sets out the following principles with which any party handling personal data must comply. All personal data must be:

- Processed lawfully, fairly, and in a transparent manner in relation to the data subject;
- Collected for specified, explicit and legitimate purposes only, and will not be processed in a way that is incompatible with those legitimate purposes;
- Adequate, relevant and limited to what is necessary in relation to the relevant purposes;
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay;
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest,



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- scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the Regulation in order to safeguard the rights and freedoms of the data subject; and
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

6. Lawful, Transparent & Relevant Data Processing

GDPR seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. GDPR states that processing of personal data shall be lawful if at least one of the following applies:

- The data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- Processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;
- Processing is necessary for compliance with a legal obligation to which the controller is subject;
- Processing is necessary to protect the vital interests of the data subject or of another natural person;
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; and
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

British Dodgeball may, from time to time, need to process sensitive personal information. We will only do so if we have a lawful basis for doing so or one of the special conditions for processing sensitive personal information applies. British Dodgeball's [Privacy Policy](#) sets out the types of sensitive personal information that we process, what it is used for and the lawful basis for the processing. We will only collect and process personal data which is accurate, adequate, relevant and proportionate for the purpose for which it was obtained. Personal data obtained for one purpose should generally not be used for unconnected purposes unless the individual has been informed of such purpose, and where required given their consent, or would otherwise reasonably expect the data to be used in this way.

7. Updating & Erasing Data

British Dodgeball shall ensure that all personal data collected and processed is kept accurate and up-to-date. The accuracy of data shall be checked when it is collected and at regular intervals thereafter. Where any inaccurate or out-of-date data is found, all reasonable steps will be taken without delay to amend or erase that data, as appropriate. Individuals may ask the Organisation to correct personal data relating to them which they consider to be inaccurate in accordance with this Policy.

The Organisation shall not keep personal data for any longer than is necessary in light of the purposes for which that data was originally collected and processed. When the data is no longer required, all reasonable steps will be taken to erase it without delay. The Organisation shall ensure that all personal data collected and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage.



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8. Accountability

British Dodgeball's Data Protection Officer is the Chief Executive Officer ("CEO"), Ben Hoyle - ben@britishdodgeball.com.

We may keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:

- The name and details of British Dodgeball, its Data Protection Officer, and any applicable third-party data controllers;
- The purposes for which we process personal data;
- Details of the categories of personal data collected, held, and processed by us; and the categories of data subject to which that personal data relates;
- Details (and categories) of any third parties that will receive personal data from British Dodgeball;
- Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards;
- Details of how long personal data will be retained by us; and
- Detailed descriptions of all technical and organisational measures taken by British Dodgeball to ensure the security of personal data.

SECTION 2 - SUPPORTING INFORMATION

9. Data Subjects

a) Rights

Individuals (in common with other data subjects) have the following rights:

- To be informed about how, why and on what basis that information is processed;
- To obtain confirmation that the individual's information is being processed and to obtain access to it and certain other information, by making a subject access request;
- To have data corrected if it is inaccurate or incomplete;
- To have data erased if it is no longer necessary for the purpose for which it was originally collected/processed, or if there are no overriding legitimate grounds for the processing (this is sometimes known as 'the right to be forgotten');
- To restrict the processing of personal information where the accuracy of the information is contested, or the processing is unlawful (but you do not want the data to be erased), or where British Dodgeball no longer needs the personal information but you require the data to establish, exercise or defend a legal claim; and
- To restrict the processing of personal information temporarily where the individual does not think it is accurate (and British Dodgeball is verifying whether it is accurate), or where the individual has objected to the processing (and British Dodgeball is considering whether our legitimate grounds override your interests).

Any data subject wishing to exercise any of the above rights should contact our Data Protection Officer as outlined in section 8.

b) Data Subject Access

A data subject may make a subject access request ("SAR") at any time to find out more about the personal data which British Dodgeball holds about them:

- British Dodgeball is normally required to respond to SARs within one month of receipt (this can be extended by up to two months in the case of complex and/or numerous requests, and in such cases the data subject shall be informed of the need for the extension);
- All subject access requests received must be forwarded to the Organisation's Data Protection Officer;
- We do not charge a fee for the handling of normal SARs;



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- British Dodgeball reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

c) Rectification of Personal Data

If a data subject informs us that personal data held by British Dodgeball is inaccurate or incomplete, requesting that it be rectified, the personal data in question shall be rectified, and the data subject informed of that rectification, within one month of receipt of the data subject's notice (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension). In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification of that personal data.

d) Erasure Request

Data subjects may request that British Dodgeball erases the personal data it holds about them in the following circumstances:

- It is no longer necessary for us to hold that personal data with respect to the purpose for which it was originally collected or processed;
- Where applicable, the data subject wishes to withdraw their consent to British Dodgeball holding and processing their personal data (such requests may require a cancellation of membership);
- The data subject objects to British Dodgeball holding and processing their personal data (and there is no overriding legitimate interest to allow us to continue doing so);
- The personal data has been processed unlawfully;
- The personal data needs to be erased in order for British Dodgeball to comply with a particular legal obligation;
- The personal data is being held and processed for the purpose of providing information society services to a child.

Unless British Dodgeball has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension). In the event that any personal data that is to be erased in response to a data subject request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

e) Restriction of Data Processing

Data subjects may request that British Dodgeball ceases processing the personal data it holds about them. If a data subject makes such a request, we shall retain only the amount of personal data pertaining to that data subject that is necessary to ensure that no further processing of their personal data takes place. In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

f) Data Portability

British Dodgeball processes personal data using automated means. Where data subjects have given their consent to British Dodgeball to process their personal data in such a manner or the processing is otherwise required for the performance of a contract between ourselves and the data subject, data subjects have the legal right under GDPR to receive a copy of their personal data and to use it for other purposes (namely transmitting it to other data controllers, e.g. other companies). To facilitate the right of data portability, British Dodgeball shall make available all applicable personal data to data subjects.



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All requests for copies of personal data shall be complied with within one month of the data subject's request (this can be extended by up to two months in the case of complex requests in the case of complex or numerous requests, and in such cases the data subject shall be informed of the need for the extension).

10. Data Protection Measures

British Dodgeball shall use appropriate technical and organisational measures to keep personal information secure, and in particular to protect against unauthorised or unlawful processing and against accidental loss destruction or damage. It shall ensure that all its employees and, where appropriate, its volunteers, sub-contractors, outsourced services providers, or other parties working on its behalf use relevant measures when working with personal data.

Technical Measures may include:

- Making sure that, where possible, emails containing personal data are encrypted;
- Where any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. Hardcopies should be shredded, and electronic copies should be deleted securely;
- Personal data may be transmitted over secure networks only;
- Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be deleted. All temporary files associated therewith should also be deleted;
- No personal data may be shared informally and if an employee, volunteer, director, subcontractor or other party working on behalf of British Dodgeball requires access to any personal data that they do not already have access to, such access should be formally requested from the Data Protection Officer.
- All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet or similar;
- Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, volunteers, sub-contractors or other parties at any time;
- If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it;
- No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets and smartphones), whether such device belongs to British Dodgeball or otherwise without the approval of a manager and, in the event of such approval, strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary;
- Personal data may only be transferred to devices belonging to subcontractors, or other parties working on behalf of British Dodgeball where the party in question has agreed to comply fully with the letter and spirit of the Data Policies and of GDPR;
- All personal data stored electronically should be backed up regularly with backups stored onsite on the Organisation's servers. All backups should be encrypted; and
- All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols.



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Organisational Measures may include:

- All employees, directors, volunteers, sub-contractors, or other parties working on behalf of British dodgeball shall be made fully aware of both their individual responsibilities and British Dodgeball's responsibilities under GDPR and under this Policy;
- Only employees, directors, volunteers, sub-contractors, or other parties working on behalf of British Dodgeball that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by British Dodgeball;
- All employees, directors, volunteers, sub-contractors, or other parties working on behalf of British Dodgeball handling personal data will be appropriately trained to do so;
- All employees and other parties working on behalf of British Dodgeball handling personal data should exercise care and caution when discussing any work relating to personal data at all times;
- Methods of collecting, holding and processing personal data shall be regularly evaluated and reviewed by British Dodgeball;
- The performance of those employees, directors, volunteers, sub-contractors, or other parties working on behalf of British Dodgeball handling personal data shall be regularly evaluated and reviewed;
- All employees, directors, volunteers, sub-contractors, or other parties working on behalf of British Dodgeball handling personal data will be bound to do so in accordance with the principles of the Regulation and this Policy;
- All sub-contractors or other parties working on behalf of British Dodgeball handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of British Dodgeball arising out of the this Policy and GDPR; and
- Where any sub-contractor or other party working on behalf of British Dodgeball handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless British Dodgeball against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

11. Data Breach Notification

All personal data breaches must be reported immediately to British Dodgeball's Data Protection Officer.

- If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection Officer must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.
- In the event that a personal data breach is likely to result in a high risk to the rights and freedoms of data subjects, the Data Protection Officer must ensure that all affected data subjects are informed of the breach directly and without undue delay.
- Data breach notifications shall include the following information:
 - The categories and approximate number of data subjects concerned;
 - The categories and approximate number of personal data records concerned;
 - The name and contact details of British Dodgeball's Data Protection Officer (or other contact point where more information can be obtained);
 - The likely consequences of the breach;
 - Details of the measures taken, or proposed to be taken, by British Dodgeball to address the breach including, where appropriate, measures to mitigate its possible adverse effects.



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12. Monitoring & Evaluation

We are committed to implementing, monitoring and evaluating this strategy to ensure we continue to adhere to GDPR and safely handle personal data as necessary in order to grow the sport of dodgeball.

Implementation plans will be reviewed by British Dodgeball on a regular basis to monitor and evaluate progress against the strategy. Where appropriate, we will make adjustments in line with updated legislation.

Policy Last Updated on: 14th November 2025